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Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Vessel Security
Docket Number USCG-1998-3884

Dear Sir or Madam:

On January 6, 2004, the U.S. Coast Guard published a Temporary Interim Rule regarding Deep Water Ports, with a request for comments. These comments are submitted in response to that request.

We appreciate the opportunity to comment on this important rulemaking.

Sincerely yours,

Daniel F. Sheehan and Robert C. North

ENCL: Comments on Docket

**COMMENTS BY Daniel F. Sheehan and Robert C. North
ON CG INTERIM TEMPORARY RULE (ITR)
Docket USCG-1998-3884**

33CFR Parts 148, 149 and 150

General Comments

The **overall format** of the regulations is user friendly. We believe that greater utilization of approved classification societies both with respect to their standards as well as their surveyors for verification of compliance would relieve potential workload increases for the Coast Guard and other regulatory agencies.

Specific Comments

Sec 149.620

We believe that the Coast Guard should permit, after review, classification society guidelines for offshore LNG facilities. We believe that this would facilitate the review, approval, and enforcement of design guidelines.

Sec 149.650 Single Point Moorings

We suggest rewording of the last sentence.

It currently reads,

“The appropriateness of a design may be shown by its compliance with standards generally used within the offshore industry that are at least equivalent, in protecting the environment, to the standards in use on January 1, 2003, by the American Bureau of Shipping or another recognized classification society.

Suggested Revision,

“The appropriateness of a design may be shown by its compliance with standards generally used within the offshore industry that are at least equivalent, in protecting the environment, to standards in use on January 1, 2003, by a recognized classification society.